

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

PATRICIA COHEN,

Plaintiff,

09 CIV 10230 (LAP)

-v-

STEVEN A. COHEN, et al.,

Defendants.

-----X

**DECLARATION OF GERALD B. LEFCOURT, ESQ.,
PURSUANT TO 28 U.S.C. §1746 AND S.D.N.Y. LOCAL RULE 2 (B)**

I, Gerald B. Lefcourt, Esq., hereby declare pursuant to the provisions of 28 U.S.C. §1746 and S.D.N.Y. Local Rule 2 (B), and under penalty of perjury, that the following is true and correct:

1. I am an attorney at law, duly admitted to practice before the courts of the State of New York and, *inter alia*, the United States District Court for the Southern District of New York.

2. I am a principal of Gerald B. Lefcourt, P.C., counsel to Patricia Cohen, plaintiff in the above action. I make this declaration in order to provide the Court with the documents that support assertions made in Patricia Cohen's Response to Defendants' Statement of Material Facts as to Which There is No Genuine Issue Dated September 18, 2015, and Counter-Statement of Additional Facts as to Which There is No Genuine Issue

3. Annexed hereto are true copies of the following documents:

a. Exhibit "A": Excerpts of the Deposition of Avron Brog, Esq.

- b. Exhibit "B": Excerpts of the Deposition of Donald Cohen
- c. Exhibit "C": Excerpts of the Deposition of Patricia Cohen
- d. Exhibit "D": Excerpts of the Deposition of Steven Cohen
- e. Exhibit "E": Excerpts of the Deposition of Robert Dobrish, Esq.
- f. Exhibit "F" : Excerpts of the Deposition of Martin Kera, Esq.
- g. Exhibit "G" : Excerpts of the Deposition of Scott Lederman, Esq.
- h. Exhibit "H": Excerpts of the Deposition of Hal Lieberman, Esq.
- i. Exhibit "I": Excerpts of the Deposition of Denis O'Connor
- j. Exhibit "J": Excerpts of the Deposition of Robert Shansky, Esq.
- k. Exhibit "K": Excerpts of the Deposition of Donald Cohen before the Securities & Exchange Commission
- l. Exhibit "L": Excerpts of the Deposition of Steven Cohen before the Securities & Exchange Commission
- m. Exhibit "M": Excerpts of the Deposition of Brett K. Lurie before the Securities & Exchange Commission
- n. Exhibit "N": Report of Findings of Robert Dobrish, dated March 18, 2015
- o. Exhibit "O": Declaration of Hal R. Lieberman, dated March 17, 2015
- p. Exhibit "P": Declaration of Patricia Cohen, dated October 13, 2015
- q. Exhibit "Q": Declaration of Joe O'Brien, dated October 7, 2015
- r. Exhibit "R": letter from M. L. Chatterton to Tenzer Greenblatt, et al, dated April 1, 1992
- s. Exhibit "S": letter from R. Shansky to S. Cohen, dated July 20, 1987
- t. Exhibit "T": "SEC Probes Rapid Rise of RCA Stock Prior to Merger", *The Pittsburg Press*, December 13, 1985

- u. Exhibit "U": letter from O. G. Obermaier, Attorney for Steven A. Cohen, to Jay A. Dubow, Esq., Division of Enforcement, Securities & Exchange Commission, dated May 23, 1986
- v. Exhibit "V": draft post-nuptial agreement
- w. Exhibit "W": letter from B. Lurie to D. Cohen dated 12/8/1986
- x. Exhibit "X": letter from J. Perles to A. Brog, dated 7/7/1988
- y. Exhibit "Y": Preliminary Draft Outline of Settlement Proposal
- z. Exhibit "Z": letter from J. Perles to Hon. Walter M. Schackman, J.S.C., dated 5/22/1991
- aa. Exhibit "AA": letter from A. Brog to J. Perles, dated 9/19/1988
- bb. Exhibit "BB": letter from R. Shansky to S. Heisler, dated 11/29/1988

October 16, 2015

s/s

Gerald B. Lefcourt